IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

CRYSTALLEX INTERNATIONAL CORP.,)	
Plaintiff,)	
v.)	Misc. No. 17-151-LPS
BOLIVARIAN REPUBLIC OF VENEZUELA,)	
Defendant.) 	

SPECIAL MASTER'S NOTICE OF SUBMISSION OF LETTERS TO COURTS IN <u>ALTER EGO ACTIONS</u>

PLEASE TAKE NOTICE THAT, on September 10, 2024, the Special Master sent letters via electronic mail to each of the courts hearing the Alter Ego Actions, informing them of the Special Master's *Motion to Enjoin the Alter Ego Claimants From Enforcing Claims Against the Republic or PDVSA by Collecting from PDVH or Its Subsidiaries in Other Forums* (D.I. 1248) (the "Motion"), and providing them with copies of the Motion. The letters and accompanying copies of the Motion are attached hereto as Exhibits A, B, and C.

¹ All capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the *Special Master's Opening Brief in Support of His Motion to Enjoin the Alter Ego Claimants from Enforcing Claims Against the Republic or PDVSA by Recovering from PDVH or Its Subsidiaries in Other Forums* (D.I. 1249).

OF COUNSEL:

Ray C. Schrock (Admitted pro hac vice)
David Lender (Admitted pro hac vice)
Alexander W. Welch (Admitted pro hac vice)
Chase A. Bentley (Admitted pro hac vice)
WEIL, GOTSHAL & MANGES LLP
767 Fifth Avenue
New York, New York 10153
Telephone: (212) 310-8000
Facsimile: (212) 310-8007
Ray.Schrock@weil.com
David.Lender@weil.com
Alexander.Welch@weil.com

Dated: September 24, 2024 11752939

Chase.Bentley@weil.com

Respectfully submitted,
POTTER ANDERSON & CORROON LLP

/s/ Myron T. Steele

Myron T. Steele (#00002)
Matthew F. Davis (#4696)
Bindu A. Palapura (#5370)
Hercules Plaza, 6th Floor
1313 North Market Street
P.O. Box 951
Wilmington, DE 19801
Telephone: (302) 984-6000
Facsimile: (302) 658-1192
msteele@potteranderson.com
mdavis@potteranderson.com
bpalapura@potteranderson.com

Counsel for Special Master Robert B. Pincus